

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY  
CAMDEN VICINAGE**

**IN RE: VALSARTAN, LOSARTAN,  
AND IRBESARTAN PRODUCTS  
LIABILITY LITIGATION**

**This Document Relates to All Actions**

MDL No. 2875

Honorable Robert B. Kugler,  
District Court Judge

**CERTIFICATION OF  
VICTORIA DAVIS  
LOCKARD, ESQ.**

VICTORIA DAVIS LOCKARD, ESQ., being of full age, certifies as follows:

1. I am a Shareholder at Greenberg Traurig, LLP, attorneys for Defendants Teva Pharmaceuticals USA, Inc., Teva Pharmaceutical Industries Ltd., Actavis Pharma, Inc., and Actavis LLC. I make this Certification based on personal knowledge and in support of Defendants' Joint Motion to Exclude the Opinions of Kaliopi Panagos, Pharm.D., R.Ph.

2. Attached hereto as Exhibit A is a true and accurate redacted copy of the Expert Report of Kali Panagos, Pharm.D., R.Ph., dated October 31, 2022, with Appendices A-B, served in MDL 2875.

3. Attached hereto as Exhibit B is a true and accurate copy of the transcript of the deposition of Kali Panagos, Pharm.D., R.Ph., in MDL 2875, dated January 11, 2023.

4. Attached hereto as Exhibit C is a true and accurate copy of the Class Certification Expert Report of Kali Panagos, Pharm.D., R.Ph., dated November 9, 2021, with Appendices A-B, served in MDL 2875.

5. Attached hereto as Exhibit D is a Chart of Dr. Panagos's Excluded Class Certification Opinions and their TPP Report Counterparts.

6. Attached hereto as Exhibit E is a true and accurate print-out of a webpage on the United States Food & Drug Administration website entitled *Abbreviated New Drug Application (ANDA) Forms and Submission Requirements*.

7. Attached hereto as Exhibit F is a true and accurate copy of the Expert Report of Timothy E. Kosty, dated December 19, 2022, served in MDL 2875. This document has been filed under seal because it contains information that has been designated as "PROTECTED INFORMATION" as defined in the applicable Amended Confidentiality and Protective Order [ECF No. 1661].

8. Attached hereto as Exhibit G is a true and accurate copy of a document entitled *CVS Caremark – Formulary Development and Management at CVS Caremark*.

9. Attached hereto as Exhibit H is a true and accurate copy of the transcript of the deposition of Kali Panagos, Pharm.D., R.Ph., in MDL 2875, dated January 21, 2022.

10. Attached hereto as Exhibit I is a true and accurate copy of the Expert Report of Laura Plunkett, dated October 31, 2022, served in MDL 2875.

Dated: March 13, 2023

Respectfully submitted,

/s/ Victoria Davis Lockard

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USA, Inc., Teva Pharmaceutical  
Industries Ltd., Actavis Pharma, Inc.,  
and Actavis LLC*

**CERTIFICATE OF SERVICE**

I hereby certify that on March 13, 2023, a copy of the foregoing document was served on all counsel of record via CM/ECF.

By: /s/ Steven M. Harkins  
Steven M. Harkins